



State of Ohio Environmental Protection Agency

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LOG C-1923

2002 SEP 23 A 10:36

Bob Taft, Governor  
Maurice D. Connor, Lt. Governor  
FILE: Christopher Jones, Director

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September 20, 2002

Mr. Johnny Reising  
U.S. DOE FEMP  
P.O. Box 398705  
Cincinnati, OH 45329-8705

**RE: DISAPPROVAL - PSP FOR AREA 7, PHASE I PRECERTIFICATION PHYSICAL  
SAMPLING AND REAL-TIME SCAN**

Dear Mr. Reising:

Ohio EPA has reviewed DOE's August 7, 2002 submittal on the "Project Specific Plan for Area 7, Phase I Precertification Physical Sampling and Real-time Scan (20500-PSP-0003) Rev A, DRAFT." Ohio EPA disapproves this document with the attached comments.

If there are any questions, please contact me at (937) 285-6466.

Sincerely,

Thomas A. Schneider  
Fernald Project Manager  
Office of Federal Facilities Oversight

cc: Jim Saric U.S. EPA  
Terry Hagen, Fluor Daniel Fernald  
Mark Shupe, HSI Geo Trans  
Ruth Vandegrift, ODH  
Michelle Cullerton, Tetra Tech Inc.

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**PROJECT SPECIFIC PLAN FOR AREA 7, PHASE I  
PRECERTIFICATION PHYSICAL SAMPLING AND REAL-TIME SCAN**

**Comments:**

1. Commenting Organization: OEPA Commentor: OFFO  
Section #: General Comment Pg. #: Line #: Code: C  
Original Comment #:

Comment: Though the plan lays out a reasonable strategy for precertification in the area, it fails to acknowledge the reality of the future use of the area. It is unclear how this precertification relates the fact that dirty operations with potentially new contaminants will be occurring in the area thus negating any precertification data. The document must more clearly state the intent of this sampling strategy as related to the future OU4 activities in the area.

2. Commenting Organization: OEPA Commentor: OFFO  
Section #: General Comment Pg. #: Line #: Code: C  
Original Comment #:

Comment: Ohio EPA's July 12, 2002 conditional approval letter on the "Area 7 Excavation Plan, Phase 1 Rev B Draft" required the development of an as-built drawing delineating which FRL exceedance locations had been removed and which had remained un-excavated. The document fails to address this requirement nor does it provide a good drawing showing the extent of excavation and the removal of specific sample locations. The precertification PSP should include the post-excavation report referenced in Ohio EPA's prior letter.

3. Commenting Organization: OEPA Commentor: OFFO  
Section #: 2.2 Pg. #: 2-5 Line #: 31-34 Code: C  
Original Comment #:

Comment: If the area has yet to be excavated, it seems inappropriate to prescribe precertification sampling locations. Such pre-decision makes it more likely that excavation could be biased over excavate in those areas. Additionally, considering the dirty OU4 operations in this area may lead to additional contaminant introduction into the area a future precertification PSP will be required for the entire area. As stated in the first comment, there is significant confusion regarding DOE's strategy for certification in this area.